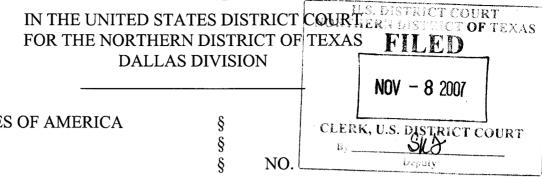
ORIGINAL



UNITED STATES OF AMERICA

v.

HECTOR CHAVARRIA (01)

a.k.a. "8"

a.k.a. "Ocho"

JOSE HERNANDEZ-CONTRERAS (02)

a.k.a. "03"

a.k.a. "Martin"

JUAN GARZA MARTINEZ (03)

a.k.a. "7"

a.k.a. "Manuel"

RAUL GERARDO ZERTUCHE III (04)

a.k.a. "06"

a.k.a. "Hipo"

DANIEL TRISTAN-CHAPA (05)

a.k.a. "5"

a.k.a. "Cheling"

JUAN MARTIN LOPEZ (06)

a.k.a. "Martin"

a.k.a. "Atlanta"

GORDO LNU (07)

a.k.a. "Pichi"

FABIAN LNU (08)

a.k.a. "10"

a.k.a. "Fabi"

TONY TITO TORRES (09)

JAVIER LOPEZ (10)

a.k.a. "Rufiano"

GABRIEL TORRES-SANCHEZ (11)

a.k.a. "Samurai"

HECTOR MENDOZA HERNANDEZ (12)

GERARDO ANTONIO GOMEZ (13)

MANUEL SILVA (14)

TIBURCIO LEIJA (15)

3-07 CR0 3 3 1 - G

SEALED

To be Filed Under Seal

88888

INDICTMENT

The Grand Jury Charges:

COUNT 1

Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance (Violation of 21 U.S.C. § 846)

Commencing on or about May 1, 2006 and continuing through the date of this indictment, in the Dallas Division of the Northern District of Texas and elsewhere, Hector Chavarria, a.k.a. "8" a.k.a. "Ocho"; Jose Hernandez-Contreras, a.k.a. "03" a.k.a. "Martin"; Juan Garza Martinez, a.k.a. "7" a.k.a. "Manuel"; Raul Gerardo Zertuche III, a.k.a. "06" a.k.a. "Hipo"; Daniel Tristan-Chapa, a.k.a. "5" a.k.a. "Cheling"; Juan Martin Lopez, a.k.a. "Martin" a.k.a. "Atlanta"; Gordo LNU, a.k.a. "Pichi"; Fabian LNU, a.k.a. "10" a.k.a. "Fabi"; Tony Tito Torres; Javier Lopez, a.k.a. "Rufiano"; Gabriel Torres-Sanchez, a.k.a. "Samurai"; Hector Mendoza Hernandez; Gerardo Antonio Gomez; Manuel Silva; and Tiburcio Leija, defendants, did intentionally and knowingly combine, conspire, confederate, and agree together and with each other, and with persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

All in violation of 21 U.S.C. § 846, the penalty for which is found at 21 U.S.C. § 841(b)(1)(A).

Indictment - Page 2

COUNT 2 Forfeiture Allegation (21 U.S.C.\(\) 853(a))

Upon conviction of the offense alleged in Count 1 of this Indictment, the defendants, Hector Chavarria, a.k.a. "8" a.k.a. "Ocho"; Jose Hernandez-Contreras, a.k.a. "03" a.k.a. "Martin"; Juan Garza Martinez, a.k.a. "7" a.k.a. "Manuel"; Raul Gerardo Zertuche III, a.k.a. "06" a.k.a. "Hipo"; Daniel Tristan-Chapa, a.k.a. "5" a.k.a. "Cheling"; Juan Martin Lopez, a.k.a. "Martin" a.k.a. "Atlanta"; Gordo LNU, a.k.a. "Pichi"; Fabian LNU, a.k.a. "10" a.k.a. "Fabi"; Tony Tito Torres; Javier Lopez, a.k.a. "Rufiano"; Gabriel Torres-Sanchez, a.k.a. "Samurai"; Hector Mendoza Hernandez; Gerardo Antonio Gomez; Manuel Silva; and Tiburcio Leija, shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as a result of the offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense.

This property includes, but is not limited to, the following:

- 1. \$50,020.00 in United States currency seized on or about September 18, 2007 in Ellis County, Texas.
- 2. \$51,720.00 in United States currency seized on or about July 25, 2007 in Bexar County, Texas.
- 3. \$1,488,950.00 in United States currency seized on or about October 4, 2007 in Denton County, Texas.
- 4. Hi Point .380 caliber pistol, model CF380, SN 840061W.

- 5. Sig Sauer 9 mm caliber pistol, model P239, SN SA31206.
- 6. SWD 9 mm caliber pistol, model Cobray M-11, SN 89-0067491.
- 7. Browning .380 caliber pistol, model BDA380, SN 425PY17241.
- 8. Keltec .380 caliber pistol, model P3AT380, SN JGH69.
- 9. Rock River Arms 5.56 mm caliber rifle, model LAR-15, SN CM91558.
- 10. Saigi 7.62 x 39 mm caliber rifle, model unknown, SN 1061420.
- 11. Unknown manufacturer 7.62 x 39 mm caliber rifle, model unknown, SN DS8477.
- 12. Assorted rounds of .380, 9 mm, .223, and 7.62 x 39 mm caliber ammunition.

A TRUE BILL

REDACTED

FOREPERSON

RICHARD B. ROPER UNITED STATES ATTORNEY

KEITH ROBINSON

Assistant United States Attorney State Bar of Texas No. 00788298 1100 Commerce Street, Third Floor

Dallas, Texas 75242

Telephone: 214.659.8758 Facsimile: 214.659.8803

JØHNJ. DeLAGARZAJII

Assistant United States Attorney - Forfeiture Counsel

State Bar of Texas No. 00796455 1100 Commerce Street, Third Floor

Dallas, Texas 75242

Telephone: 214.659.8682 Facsimile: 214.659.8803

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

FILED FILED

NOV - 8 2007

CLERK, U.S. DISTRICT COURT

THE UNITED STATES OF AMERICA

v. 3-07 CR0331-G

HECTOR CHAVARRIA (01), a.k.a. "8", a.k.a. "Ocho",
JOSE HERNANDEZ-CONTRERAS (02), a.k.a. "03", a.k.a. "Martin",
JUAN GARZA MARTINEZ (03), a.k.a. "7", a.k.a. "Manuel",
RAUL GERARDO ZERTUCHE III (04), a.k.a. "06", a.k.a. "Hipo",
DANIEL TRISTAN-CHAPA (05), a.k.a. "5", a.k.a. "Cheling",
JUAN MARTIN LOPEZ (06), a.k.a. "Martin", a.k.a. "Atlanta",
GORDO LNU (07), a.k.a. "Pichi", FABIAN LNU (08), a.k.a. "10", a.k.a. "Fabi",
TONY TITO TORRES (09), JAVIER LOPEZ (10), a.k.a. "Rufiano"
GABRIEL TORRES-SANCHEZ (11), a.k.a. "Samurai",
HECTOR MENDOZA HERNANDEZ (12), GERARDO ANTONIO GOMEZ (13)
MANUEL SILVA (14), TIBURCIO LEIJA (15)

SEALED INDICTMENT

21 U.S.C. § 846

Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance

21 U.S.C. § 853(a) Forfeiture Allegation

TR 2 Counts		
A true bill rendered	REDACTED	
DALLAS	FOREPERSON	-
Filed in open court this 7th day of November, 2007		
	Cler	·k

Warrants to be Issued for all Defendants

JAINED STATES BASTREE TIMAGISTRATE JUDGE

No Criminal Complaint Pending

Unit	FED STATES DISTRICT COURT	Related Ca	se Information			
No	RTHERN DISTRICT OF TEXAS	Superseding Indictment: Yes X No	New Defendant:	X Yes No		
1.	Defendant Information	Pending CR Case in NDTX: Yes	No If Yes, number	:		
	Juvenile: Yes X No	Search Warrant Case Number				
	If Yes, Matter to be sealed:	R 20 from District of				
	XYes No	Magistrate Case Number:	7 CRO 3	31-G		
	Defendant Name	HECTOR CHAVARRIA				
	Alias Name	"8"; "Ocho"	Bur Curro West Base & 2	A COMPANY CONTRACTOR		
	Address		The state of the s	Constant Process		
			NOV - 8	2		
	County in which offense was commit	ted:		Account to the control of the contro		
2	•					
2.	U.S. Attorney Information	.	a ii maxana an	00700100		
	AUSA KEITH ROBINSON Bar # TX Bar No. 00788298					
3.	Interpreter					
	Yes X No If Yes, list language and/or dialect:					
	i i es 🕰 No II i es, list is	anguage and/or dialect.		***************************************		
4.	Location Status					
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	On Pretrial Release					
_	TIEC Citations					
5.	U.S.C. Citations	•	7	1		
	Total # of Counts as to This Defenda	nt: 2 Petty	Misdemeanor	X Felony		
	Citation	Description of Offense Charged	ì	Count(s)		
	21 U.S.C. § 846	Conspiracy to Distribute and		1		
		Intent to Distribute a Control				
	21 U.S.C. § 853(a)	Forfeiture Allegation		2		
	0 ()					
		L	111	The second secon		
	Date: November 1, 2007	Signature of AUSA:	EITH ROBINSOI	NT.		
		<i>V</i> K	ти корияо	.Υ		

Date: November 1, 2007 Signature of AUSA:

KEITH ROBINSON

UNITED STATES DISTRICT COURT			
NO	RTHERN DISTRICT OF TEX	Superseding Indictment: Yes X No New Defendant: X Yes 1	
1.	Defendant Information	Pending CR Case in NDTX: Yes No If Yes, number:	
	Juvenile: Yes X No	Search Warrant Case Number	
	If Yes, Matter to be sealed:	R 20 from District of	
	X Yes No	Magistrate Case Number: 3 - 07 CRO 3 3 1 - G	
	Defendant Name	JUAN GARZA MARTINEZ (03)	
	Alias Name	"7" and "Manuel" PECEIVED	
Address		The Company of the Co	
		NOV - 8 2	
	County in which offense was co	ommitted:	
2.	U.S. Attorney Information	The state of the s	
	AUSA KEITH ROBINSON Bar # TX Bar No		
4.	Location Status Arrest Date - Warrant to be is: Already in Federal Custody Already in State Custody		
5.	U.S.C. Citations		
	Total # of Counts as to This De	fendant: 2 Petty Misdemeanor X Felony	
	Citation	Description of Offense Charged Count(s)	
	21 U.S.C. § 846	Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance	
	21 U.S.C. § 853(a)	Forfeiture Allegation 2	
	Date: November 1, 2007	Signature of AUSA:	

	TED STATES DISTRICT CO		
NO	RTHERN DISTRICT OF TEX	XAS Superseding Indictment: Yes X No New Defendan	t: X Yes No
1.	Defendant Information	Pending CR Case in NDTX: Yes No If Yes, number	er:
	Juvenile: Yes X No	Search Warrant Case Number	
	If Yes, Matter to be sealed:	R 20 from District of	
	X Yes No	Magistrate Case Number: 3 - 07 CRO 3	31-G
	Defendant Name	DANIEL TRISTAN-CHAPA (05)	·
	Alias Name	"5" and "Cheling"	
	Address	RECEIVE	
		NOV - 8 200	7
	County in which offense was c	ommitted:	
2.	U.S. Attorney Information	Constant Desired Co	COUNT F TEXAS
	AUSA KEITH ROBINSON Bar # TX Bar N		<u>. 00788298</u>
 4. 	Interpreter Yes X No If Yes Location Status Arrest Date - Warrant to be is	s, list language and/or dialect:	
	Already in Federal Custody Already in State Custody On Pretrial Release	y as of	
5.	U.S.C. Citations		
	Total # of Counts as to This De	efendant: 2 Petty Misdemeanor	XFelony
	Citation	Description of Offense Charged	Count(s)
	21 U.S.C. § 846	Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance	1
	21 U.S.C. § 853(a)	Forfeiture Allegation	2
	Date: November 1, 2007	Signature of AUSA:	

United States District Court Northern District of Texas			Case Information	t X Yes No.
1.	Defendant Information	Pending CR Case in NDTX: Y	es No If Yes, number	er:
	Juvenile: Yes X No	Search Warrant Case Number		
	If Yes, Matter to be sealed:	R 20 from District of		
	X Yes No	Magistrate Case Number: 3	07 CRU3	31 - G
	Defendant Name	JUAN MARTIN LOPE	Z (06)	TARITY .
	Alias Name	"Martin" and "Atlanta"	RECEIV	25.5 PO
	Address	**************************************	The state of the s	and the control of th
			NOV - 8 2	2007
	County in which offense was co	ommitted:	CLEPK, U.S. DISTRIC	OF TEXAS
2.	U.S. Attorney Information			
	AUSA KEITH ROBINSO	<u>ON</u>	Bar # TX Bar No	. 00788298
3.	Interpreter $\square_{Yes} \ \ \overline{X} No \qquad If \ Yes,$	list language and/or dialect:		· · · · · · · · · · · · · · · · · · ·
4.	Location Status			
	Arrest Date - Warrant to be iss	sued		
	Already in Federal Custody Already in State Custody On Pretrial Release	as of		
5.	U.S.C. Citations			
	Total # of Counts as to This Det	fendant: 2 Petty	Misdemeanor	XFelony
	Citation	Description of Offense Cha	rged	Count(s)
	21 U.S.C. § 846	Conspiracy to Distribute and Pos Intent to Distribute a Controlled		1
	21 U.S.C. § 853(a)	Forfeiture Allegation		2
	Date: November 1, 2007	Signature of AUSA:	KEITH ROBINS	SON

UNITED STATES DISTRICT COURT		Related Case Information		
Nor	RTHERN DISTRICT OF TEXAS	Superseding Indictment: Yes X No New Defendant: X Yes No		
1.	Defendant Information	Pending CR Case in NDTX: Yes No If Yes, number:		
	Juvenile: Yes X No	Search Warrant Case Number		
	If Yes, Matter to be sealed:	R 20 from District of		
	X Yes No	Magistrate Case Number: 3 - 07 CR 0 3 3 1 - G		
	Defendant Name	GORDO LNU (07)		
	Alias Name	"Pichi"		
	Address	HECEIVED .		
		NOV - 8 2007 ·		
	County in which offense was com	nitted:		
2		nitted: NOATHEAN DISTRICT OF TEXAS		
2.	U.S. Attorney Information			
	AUSA KEITH ROBINSON	Bar # TX Bar No. 00788298		
3.	Interpreter			
	· ·	t language and/or dialect:		
4.	Location Status			
	Arrest Date - Warrant to be issue	d		
	Already in Federal Custody as Already in State Custody On Pretrial Release	of		
5.	U.S.C. Citations			
	Total # of Counts as to This Defen	dant: 2 Petty Misdemeanor X Felony		
	Citation	Description of Offense Charged Count(s)		
		onspiracy to Distribute and Possess with tent to Distribute a Controlled Substance		
	21 U.S.C. § 853(a)	orfeiture Allegation 2		
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Date: November 1, 2007 Signature of AUSA: _

Date: November 1, 2007 Signature of AUSA:

KEITH ROBIN

UNITED STATES DISTRICT COURT					
NOI	RTHERN DISTRICT OF TEX	AS Superseding Indictment: Yes X No New Defendant:	X Yes No		
1.	Defendant Information	Pending CR Case in NDTX: Yes No If Yes, number	:		
	Juvenile: Yes X No	Search Warrant Case Number			
	If Yes, Matter to be sealed:	R 20 from District of			
	X Yes No	Magistrate Case Number: 3-07 CRO 3	31-G		
	Defendant Name	TONY TITO TORRES (09)			
	Alias Name	RECEIVE	<u> </u>		
	Address	T throw U land	- - - - - - - - - -		
		NOV - 8 200	7		
	County in which offense was con	mmitted: CSSC, U.S. OCCUPANT NOT THE PROPERTY OF THE PROPERTY	COUNT DYNAS		
2.	U.S. Attorney Information		The second secon		
	AUSA KEITH ROBINSO	N Bar # TX Bar No.	00788298		
3.	Interpreter Yes X No If Yes,	list language and/or dialect:			
4.	Location Status				
	Arrest Date - Warrant to be issued				
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5.	U.S.C. Citations				
	Total # of Counts as to This Defe	endant: 2 Petty Misdemeanor	X Felony		
	Citation	Description of Offense Charged	Count(s)		
	•	Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance	1		
	21 U.S.C. § 853(a)	Forfeiture Allegation	2		
	Date: November 1, 2007	Signature of AUSA: KEITH ROBINSO	ON		

	RTHERN DISTRICT OF TEXA		ictment: Yes	No New Defendan	t: X Yes No
1.	Defendant Information		,	es No If Yes, number	
••					
	Juvenile: Yes X No		ct of		
	If Yes, Matter to be sealed: X Yes No	Magistrate Case	Number: 3 -	07 CRO3	31-G
	Defendant Name	GABRIE	EL TORRES-SA	ANCHEZ (11)	
	Alias Name	"Sam	urai"	RECEIV	- February 1
	Address			S Six and South	The Control of the Co
	**************************************			NOV - 8 2	097
	County in which offense was cor	nmitted:		CLEAN DESTROY NORTH SERVICE	PRODUCTION CONTRACTOR OF THE STATE OF THE ST
2.	U.S. Attorney Information			The many that the second secon	Salar
	AUSA KEITH ROBINSO	N		Bar # TX Bar No	o. 00788298
3.	Interpreter Yes $\overline{\mathbf{X}}$ No If Yes, 1	list language and/or d	lialect:		
4.	Location Status				
	Arrest Date - Warrant to be issu	ued			
	Already in Federal Custody a Already in State Custody On Pretrial Release	as of			
5.	U.S.C. Citations				
	Total # of Counts as to This Defe	endant: 2	Petty	Misdemeanor	X Felony
	Citation	Description	of Offense Cha	rged	Count(s)
		Conspiracy to Dis Intent to Distribut			1
	21 U.S.C. § 853(a)	Forfeiture Allegat	ion		2
	Date: November 1, 2007	Signature of AUS	A: /	KEITH ROBINS	SON

UNITED STATES DISTRICT COURT			
NOI	RTHERN DISTRICT OF TEX	Superseding Indictment: Yes X No New Defendant	: X Yes No
1.	Defendant Information	Pending CR Case in NDTX: Yes No If Yes, number	r:
	Juvenile: Yes X No	Search Warrant Case Number	
	If Yes, Matter to be sealed:	R 20 from District of	
	X Yes No	Magistrate Case Number: 3 - 07 CRO 3 3	3 1 - G
	Defendant Name	HECTOR MENDOZA HERNANDEZ (12)	l .
	Alias Name	CONTRACTIVE!	5
	Address		71
		NOV - 8 200	!
	County in which offense was co		
2.	U.S. Attorney Information	NORTHERN DISTRICT C	S. Flores
	AUSA KEITH ROBINSO	DN Bar # TX Bar No	. 00788298
 4. 	Interpreter Yes X No If Yes Location Status Arrest Date - Warrant to be is Already in Federal Custody Already in State Custody On Pretrial Release		
5.	U.S.C. Citations		
	Total # of Counts as to This De	fendant: 2 Petty Misdemeanor	XFelony
	Citation	Description of Offense Charged	Count(s)
	21 U.S.C. § 846	Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance	1
	21 U.S.C. § 853(a)	Forfeiture Allegation	2
	Date: November 1, 2007	Signature of AUSA:	

UNITED STATES DISTRICT COURT			
Nor	THERN DISTRICT OF TEXA	Superseding Indictment: Yes X No New Defendant: X Yes No	No
1.	Defendant Information	Pending CR Case in NDTX: Yes No If Yes, number:	
	Juvenile: Yes X No	Search Warrant Case Number	-
	If Yes, Matter to be sealed:	R 20 from District of	-
	$\overline{\mathbf{X}}$ Yes \square No	Magistrate Case Number: 3-07 CR0 3 3 1 - G	
	Defendant Name	GERARDO ANTONIO GOMEZ (13)	
	Alias Name	PECEIVED	
	Address	LALUE IVED	
		NOV - 8 2007	
	County in which offense was com	nitted: CLEAK, H.S. DISTRICT OCURT NORTHERN DISTRICT OF TEXAS	
2.	U.S. Attorney Information	TO TEARS	
	AUSA KEITH ROBINSON	Bar # TX Bar No. 00788298	
3.	Interpreter Yes X No If Yes, list Location Status	t language and/or dialect:	
4.	Arrest Date - Warrant to be issue		
	Already in Federal Custody as Already in State Custody On Pretrial Release	of	
5.	U.S.C. Citations		
	Total # of Counts as to This Defer	dant: 2 Petty Misdemeanor X Felony	
	Citation	Description of Offense Charged Count(s)	
		onspiracy to Distribute and Possess with tent to Distribute a Controlled Substance	
	21 U.S.C. § 853(a) F	orfeiture Allegation 2	
			sile time
	Date: November 1 2007 S	gnature of AUSA:	

United States District Court Northern District of Texas			lated Case Information Yes X No New Defendant	: X Yes No
1.	Defendant Information Juvenile: Yes X No If Yes, Matter to be sealed: X Yes No Defendant Name Alias Name Address	Pending CR Case in NDTX: Search Warrant Case Number	Yes No If Yes, number 3 - 0 7 CR 0 3	31-G
	County in which offense was co	nmitted:	NOV - 8 20	7
2.	U.S. Attorney Information AUSA KEITH ROBINSO	ON	Bar # TX Bar No	. 00788298
3.	Interpreter Yes X No If Yes,	list language and/or dialect:		
4.	Arrest Date - Warrant to be iss Already in Federal Custody Already in State Custody On Pretrial Release			
5.	U.S.C. Citations Total # of Counts as to This Def	fendant: 2	Petty Misdemeanor	XFelony
	Citation 21 U.S.C. § 846	Description of Offens Conspiracy to Distribute an Intent to Distribute a Contre	d Possess with	Count(s)
	21 U.S.C. § 853(a)	Forfeiture Allegation		2
	Date: November 1, 2007	Signature of AUSA:	KEITH ROBINS	SON

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS			: X Yes No		
1.	Defendant Information	Pending CR Case in NDTX: Yes No If Yes, number			
	Juvenile: Yes X No	Search Warrant Case Number			
	If Yes, Matter to be sealed:	R 20 from District of			
	X Yes No	G			
	Defendant Name	TIBURCIO LEIJA (15)			
	Alias Name				
Address		FECEIVEL	1 6		
		NOV - 8 2007	•		
	County in which offense was c	ommitted:	THE CASE		
2.	U.S. Attorney Information	World The Control of	ACCOUNTS OF THE PROPERTY OF TH		
	AUSA KEITH ROBINSO	ON Bar # TX Bar No	. 00788298		
3.	Interpreter Yes X No If Yes	, list language and/or dialect:			
4.	Location Status				
	Arrest Date - Warrant to be issued				
	Already in Federal Custody Already in State Custody On Pretrial Release	as of			
5.	U.S.C. Citations				
	Total # of Counts as to This De	efendant: 2 Petty Misdemeanor	X Felony		
	Citation	Description of Offense Charged	Count(s)		
	21 U.S.C. § 846	Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance	1		
	21 U.S.C. § 853(a)	Forfeiture Allegation	2		
		<i>i/h/1/</i>	A Company of the Comp		
	Date: November 1, 2007	Signature of AUSA: KEITH ROBINS	SON		